

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:

CITY OF CHESTER, PENNSYLVANIA,

Debtor.

Chapter 9

Case No. 22-13032-amc

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), the undersigned appear as counsel for U.S. Bank Trust Company, National Association, as successor in interest to U.S. Bank National Association, as Indenture Trustee under that certain Trust Indenture, dated as of August 1, 2017, by and between the City of Chester, Pennsylvania and U.S. Bank National Association, as Trustee (the “Trustee”), in this bankruptcy proceeding and any related adversary proceedings as needed, and request is hereby made that all papers, pleadings, motions, and applications served or required to be served in this case and in any related proceedings be given to and served upon:

Ryan K. Cochran, Esq.
David E. Lemke, Esq.
WALLER LANSDEN DORTCH & DAVIS, LLP
511 Union Street, Suite 2700
Nashville, TN 37219
Tel: (615) 244-6380
Fax: (615) 244-6804
ryan.cochran@wallerlaw.com
david.lemke@wallerlaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and above-specified Sections of the Bankruptcy Code, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether

transmitted or conveyed by mail, delivery, telephone, telegraph, telex, electronic filing or otherwise filed or made with regard to the jointly administered cases and proceedings therein and for the purposes of CM/ECF.

This Notice of Appearance and Request for Service of Papers is without prejudice to the Trustee's rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, and shall not be deemed or construed to submit the Trustee to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including, without limitation, the Trustee's (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in the cases or in any case, controversy, or proceeding related to the cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which the Trustee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Trustee expressly reserves.

Dated: November 16th, 2022

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/ Ryan K. Cochran

Ryan K. Cochran (*pro hac vice*)

David E. Lemke (*pro hac vice* admission pending)

511 Union Street, Suite 2700

Nashville, TN 37219

Telephone: (615) 244-6380

Facsimile: (615) 244-6804

Email: david.lemke@wallerlaw.com

ryan.cochran@wallerlaw.com

Attorneys for U.S. Bank Trust Company, National Association, as successor in interest to U.S. Bank National Association, as Indenture Trustee under that certain Trust Indenture, dated as of August 1, 2017, by and between the City of Chester, Pennsylvania and U.S. Bank National Association, as Trustee (the "Trustee")

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed and served via the Court's CM/ECF filing and noticing system this 16th day of November, 2022, to all parties registered to receive electronic notices in this case.

/s/ Ryan K. Cochran

Ryan K. Cochran